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Attorneys for Creditor, United Teletch Financial Federal Credit Union

File No. 50324

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In Re:	:	Chapter 13, Case No. 18-19513
KENNETH EBBERT, JR.	:	Honorable Christine M. Gravelle
	:	Hearing Date: September 19, 2018
Debtor.	:	Objection to Confirmation of Ch. 13 Plan

**NOTICE OF OBJECTION TO CONFIRMATION OF PLAN
PURSUANT TO BANKRUPTCY RULE 3015**

The undersigned attorneys for the creditor, United Teletch Financial Federal Credit Union, holder of a secured claim against debtor as is set forth in its Proof of Claim, hereby objects to the confirmation of the debtor's proposed Chapter 13 Plan on the basis of:

- a) This creditor is the holder of a second mortgage on the property located at 960 Farmingdale Road, Jackson, New Jersey which mortgage was recorded on October 21, 2014 in Book 15922, Page 801 of the Ocean County Clerk's Office. This is the debtor's primary residence. Debtors were, and are, in default of their mortgage loan.
- b) Debtor's plan proposes to void this second mortgage lien and reclassify the underlying claim from secured to completely unsecured. Debtors value the property at \$340,000.00. The first mortgage holder filed a Proof of Claim in the

amount of \$367,388.74

- c) United Teletch Financial objections pursuant to 11 U.S.C. § 1322(b)(2). The Zillow estimated value of the property is \$484,980.00. A copy of the appraisal is attached as “Exhibit A.” A drive-by appraisal has been ordered by the credit union, but is not yet available.
- d) The plan fails to provide for any payment on the secured debt based on a value that is disputed by this creditor.

For the reason stated above, and for any others that the Court deems fair, creditor respectfully requests that confirmation of debtor’s proposed plan must be denied.

McKENNA, DuPONT, HIGGINS & STONE, PC
Attorneys for Creditor, United Teletch Financial
Federal Credit Union

By: /s/ Michael R. DuPont
MICHAEL R. DuPONT, Esquire

Dated: September 12, 2018

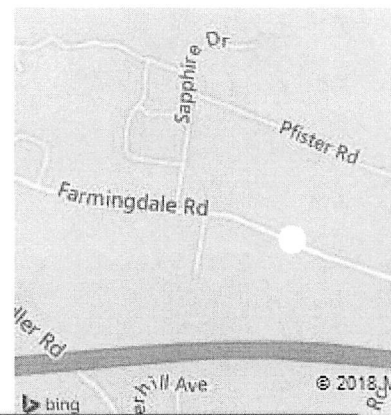
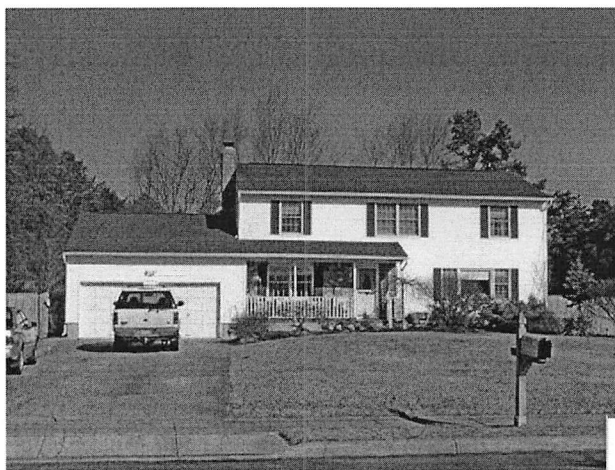
EXHIBIT A

GET MORE INFO SAVE SHARE MORE

City, State, or Zip



New Jersey · Jackson · 08527 · 960 Farmingdale Road



**960
Farmingdale
Rd,
Jackson, NJ
08527**

OFF MARKET

Zestimate[®]:

\$484,980

Rent Zestimate[®]:

\$2,500 /mo

-- beds · -- baths ·
2,748 sqft

Beautiful Colonial on 1+ Acres!

Facts and Features



Type
Single
Family



Year
Built
1985



Heating
No Data



Cooling
No Data



Parking
2 spaces



Lot
No Data

INTERIOR FEATURES

Home Shoppers are Waiting



Ask an agent about market
conditions in your
neighborhood.

Your name

Phone

Email

I own this home and would like
to ask an agent about selling

Contact Agent

Or call 732-784-4160 for more info

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4 beds, 3.0 baths, 2652 s...
966 Farmingdale Rd, Jac...